



WELCOME TO

# Major UK regulatory & tax reporting changes in 2026.



**With Fiona Jelly**  
CEO, Complyfirst



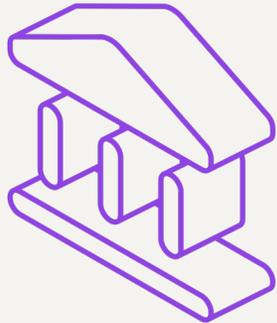
# Fiona Jelly

-  **Founder & CEO of Complyfirst**, a compliance workflow automation platform for PIs, EMI's, and banks.
-  **Brings 12+ years of compliance experience** from Goldman, Citi, and fintech start-ups.
-  **Fiona is a Barrister in England & Wales and Certified Anti-Money Laundering Specialist.**



# Today's snapshot session

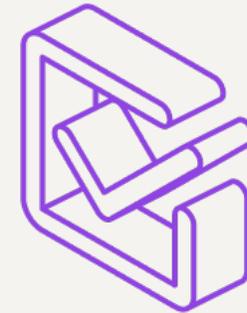
Covering: FCA monthly safeguarding return, CRS2, and CARF reporting.



**Understand the scope  
of each requirement**



**Clarify key data inputs  
needed to report**



**Outline next steps  
to get ready for submission**



# What's coming up for UK reporting teams

19 JUNE 2026

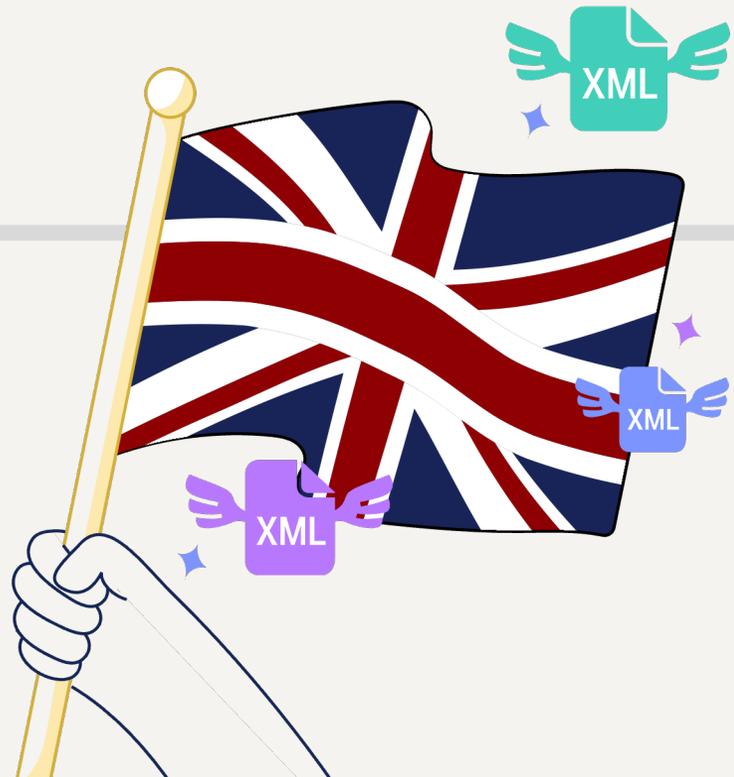
FCA safeguarding  
return

31 MAY 2027

CRS2

31 MAY 2027

CARF





LET'S POLL:

**How ready do you feel for the  
2026/27 UK reporting changes?**

*(Safeguarding + CRS2 + CARF — where applicable)*

# FCA Monthly Safeguarding Return Snapshot



## Legal Basis

SUP 16.14A / SUP 16 Annex 29BR – Safeguarding return (FCA 2025/38)

## Objective

Give the FCA regular, comprehensive visibility on how firms safeguard relevant customer funds. This is part of the FCA's response to recent PI/EMI safeguarding failures, with tighter, more frequent reporting.

## Description

A monthly return covering: safeguarding method, balances, where funds are held, resource vs requirement, D+1 segregation, reconciliations, record keeping, and notifiable CASS breaches.

## Scope

- **Who:** All safeguarding institutions, including: API, EMI, SPI (opt-in) and SEMI (opt-in)
- **What:** Relevant funds safeguarded under the PSRs/EMRs

## Submission

Submitted within 15 business days after month-end via the FCA RegData platform.

## Considerations

- **Sections 1 – 2 + 9:** all firms
- **Sections 3 – 8:** only if you were required to safeguard in the period
- **Sections 10 – 17:** only for unrelated payment services i.e. EMI + UPS, SEMI (opt in), Credit union (opt in)

## Data fields needed

Core sections 1 – 9, covering:

1. **Firm + category** (and audit details if applicable)
2. **Safeguarding method** + client count
3. **Highest / lowest** safeguarding requirement
4. **Where funds are held:** accounts / assets / insurance / guarantees
5. **Resource vs requirement** (incl. excess/shortfall + adjustments)
6. **D+1 resource vs requirement**
7. **Reconciliation cadence** (internal + external)
8. **Accounts + acknowledgement letters**
9. **Notifiable CASS breaches** (Y/N + compliance Y/N)

Sections 10-17 cover unrelated payment services (UPS)

- Repeat the same checks as above for payment services unrelated to e-money issuance.

## Next steps

- **Determine scope:** Are you required to safeguard (or opted in) and do UPS sections 10-17 apply.
- **Automate reconciliations:** You'll be doing this monthly, so setting up a monthly pack will be essential.
- **Diarise submissions:** Ensure you can submit the returns within 15 business days of month-end.

## DEADLINE

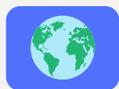
7 May 2026 is go-live, with first return due 15 business days after month end (19 June 2026)

## FREQUENCY

Monthly

## FILE FORMAT

Key in via RegData platform  
Or automate via XML / API submission



# Common Reporting Standard 2 (CRS2) Snapshot

## Legal Basis

OECD Common Reporting Standard (as amended "CRS 2") implemented in the UK under HMRC CRS rules and guidance.



## Objective

Expand tax transparency by ensuring Financial Institutions report all relevant financial accounts (including newly in-scope e-money/digital products) with stronger due diligence and complete tax residency data.



## Description

An annual return requiring FIs to capture and validate customer tax residency at onboarding, monitor changes in circumstances, and file CRS 2 reportable data to HMRC each year.



## Scope

- **Entity:** Reporting financial institutions under CRS include banks, PI's and EMI's where product meets CRS "financial account" test.
- **Activity:** Offering CRS financial accounts (if customers can hold stored value like an account assume it's reportable)
- **Nexus:** Account holder tax residency (global) – you may need to report non-UK tax residents too, because CRS is a global AEOI standard (e.g. an UK EMI may report Canadian tax resident customer under CRS.)



## Submission

Generate XML using the OECD CRS schema and submit it to HMRC via its online reporting service.



## Considerations

- 2026 is the "data year": Firms must collect customer and account data in line with CRS2. You may need to update onboarding forms and expand data capture.
- 2027 is the "reporting year": Firms must report using the new CRS2 standards, relying on the data collected in 2026.



## Data fields needed

**Accounts:** Account ID/ref, product type, open/close status, reportable balance/value (year-end) and reportable income (where applicable)

**Individuals:** Name, address, DOB (and POB where required), tax self-cert, all tax residences + TIN per country (or reason if unavailable)

**Corporates:** Entity name, address, tax self-cert + entity CRS classification, plus controlling persons (name, address, DOB, tax residences + TINs) where required



## Next steps

1. **Confirm scope:** Classify accounts/wallets to identify which are CRS-reportable accounts
2. **Fix onboarding:** Capture all tax residences + self-cert + TIN per country (or reason if missing) from day one
3. **Ongoing monitoring:** Cross-check tax data vs KYC and track changes in circumstances that might prompt you to ask the customer to refresh their tax info.



## DEADLINE

Collect data from 1 Jan 2026. Submit by 31 May 2027

## FREQUENCY

Annual

## FILE FORMAT

XML



# UK CARF Crypto Asset Reporting Snapshot

(Annual + multi-tax residency)



## Legal Basis

OECD Crypto-Asset Reporting Framework (CARF), implemented in the UK under HMRC Reporting Cryptoasset Service Providers (Due Diligence and Reporting Requirements) Regulations 2025

## Objective

Enable HMRC to receive standardised reports on crypto-asset users and their relevant transactions and exchange that info with partner jurisdictions so it can enforce tax compliance.

## Description

An annual return requiring cryptoasset service providers to identify reportable users, collect tax residency and TINs, and report in-scope cryptoasset transactions to HMRC in a standard format.

## Scope

- **Entity:** Any Reporting Crypto Asset Service Provider (RCASP) required to report to HMRC, including UK and non-UK firms providing cryptoasset services to reportable users.
- **Nexus:** UK tax-resident users (reporting is triggered by the user's tax residence, not where the platform is headquartered).
- **Activity:** Facilitating in-scope cryptoasset transactions (e.g. crypto-to-fiat, crypto-to-crypto, transfers and certain in-scope payment transactions when crypto is used to pay for goods and services)

## Submission

Generate XML using the CARF schema and submit it to HMRC via its online reporting service.

## Considerations

- **User notice required:** If a user/person is reportable, you must notify them their data will be reported to HMRC and may be shared internationally (by 31 Jan after their first reportable year)
- **HMRC registration:** RCASPs must register with HMRC (by 31 May 2027, or 31 Jan after their first in-scope year, whichever is later)

## Data fields needed

**Accounts/wallets:** User/ account ref + wallet address/ID for reportable crypto activity

**Individuals:** Name, address, DOB, all tax residences, TIN per country (or valid reason code where not available)

**Corporates:** Entity name, address, tax residence + TIN(s), plus controlling persons (same fields as for individuals)

**Transactions:** Crypto-asset type + annual totals by category (crypto-to-fiat, crypto-to-crypto, transfers and retail payments)

## Next steps

1. **Register with HMRC:** If you're an RCASP, complete HMRC registration
2. **Build customer comms:** notify reportable users of HMRC reporting + possible cross-border sharing
3. **Capture data + tag:** Update your onboarding flow to capture tax residence + TINs (and reason codes) and tag UK reportable users + transaction categories (above) so reporting can be generated.

## DEADLINE

Collect data from 1 Jan 2026. Submit by 31 May 2027

## FREQUENCY

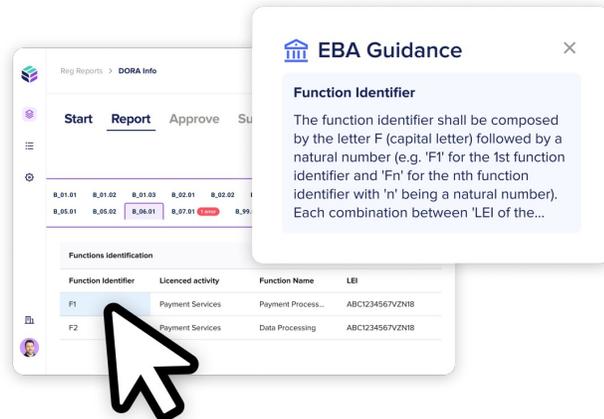
Annual

## FILE FORMAT

XML

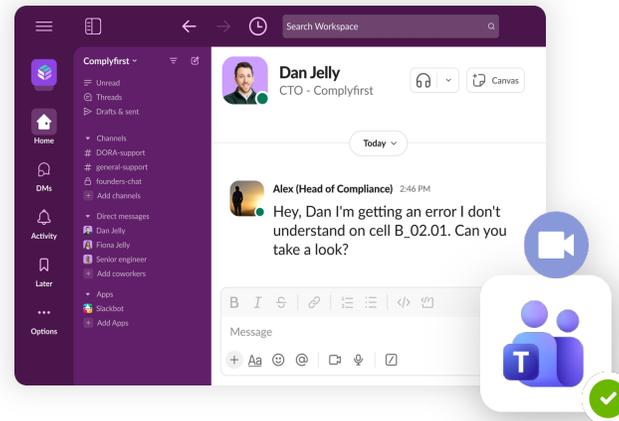
# Complyfirst can help 🙌

(with tech + support that's different from what you're used to)



## Not just a "template converter"

Automate data collection, get built-in regulator guidance, and validate data in real time.



## Fast 1:1 support

Message us for fast help with preparation and submission, even on deadline day.

## Multi-jurisdiction coverage

We cover reporting across jurisdictions. No need for your teams to interpret schemas and rules from scratch.



**Your first report is *on us!*** 🚀



**Pick a report and we'll help you  
get it submitted (*at no cost*)**

[fiona@complyfirst.co](mailto:fiona@complyfirst.co) | [dan@complyfirst.co](mailto:dan@complyfirst.co)



**Do you want us to reach  
out to help you with one of  
these reports?**

Questions?

# Thank you

Let's stay in touch

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# FCA FAQs

## Q: What does UPS really mean?

UPS = “unrelated payment services.” It means payment services you provide that are not directly linked to issuing e-money - so the FCA asks you to complete Sections 10–17 to report safeguarding for that separate perimeter.

## Q: What triggers a notifiable breach in section 9?

Any notifiable safeguarding issue during the month (e.g. material record errors, failed reconciliations, unresolved shortfalls, or insurance/guarantee cover issues) and whether you notified the FCA.

## Q: How do I automate this monthly return?

Automate it by generating a monthly safeguarding pack straight from your back-office/data warehouse, auto-calculate resource vs requirement, review and approve it, and submit to RegData via API.



# CRS FAQs

## Q: What are the penalties for misreporting or missing CRS controls?

Penalties can scale quickly e.g. £300 for compliance failures (e.g. missing self-cert), daily penalties for ongoing issues £60/day, and up to £3,000 per inaccuracy. Penalties can run into six figures if a large volume of accounts are affected.

## Q: How do you handle “change in circumstances”?

It's any signal that a customer's CRS tax residency may be wrong (e.g. address change, new phone country code etc). You need triggers and a workflow to refresh self-certs and tax data when those triggers fire.

## Q: What's the fastest way to tell if a product is CRS reportable?

If customers can hold stored value like an account (or earn reportable income) assume it's in scope. It's good practice to have a formal product classification doc showing which are deemed “financial accounts” and why.



# UK CARF FAQs

## **Q: Are non-UK crypto firms in-scope?**

Yes. If you provide cryptoasset services to UK tax-resident users, you may be a UK reporting cryptoasset service provider and need to register with HMRC and report under UK CARF.

## **Q: How do we handle users with multiple tax residencies?**

You must capture all tax residencies and TINs per country, then report accordingly.

## **Q: Do we need to notify customers every year?**

You must notify a reportable user/person by 31 Jan after the first calendar year you report them and keep evidence you did it.